

99-3125, 99-4360, 99-4361,  
99-4365, 99-4378, 99-4383SV

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

CARLOS A. GARCIA PEREZ, ET AL.  Plaintiffs  V.  ALVARO SANTAELLA, M.D., ET AL.  Defendants	CIVIL NO. 97-1703 (JAG)  PLAINTIFFS DEMAND TRIAL BY JURY
--------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------

**NOTICE OF APPEARANCE AND MOTION FOR TIME  
EXTENSION TO PLEAD**

**TO THE HONORABLE COURT:**

**COME NOW** co-defendant, Sindicato de Aseguradores para la Suscripción Conjunta de Seguro de Responsabilidad Profesional Médico-Hospitalaria (hereinafter referred to as "SIMED"), as insurance carrier of Drs. Alvaro Santaella Jiménez, Iván Terón Méndez, Mildred D. Quiñones Pardo, Amaury Vélez Torres, Alberto de la Vega and Adel Vargas Rodríguez, and respectfully state and request as follows:

1. The undersigned attorney has been assigned to represent the appearing codefendant in the instant case.
2. In order to study all factual allegations contained in the Amended Complaint and to do the necessary legal research, which would allow the appearing codefendants to file an adequate responsive pleading, the appearing codefendant needs an extension of time of at least thirty (30) days.

**WHEREFORE**, it is respectfully requested from this Honorable Court to enter the appearance of the undersigned attorney as counsel of record for SIMED. It is further

requested, pursuant to Local Rule 311.14, that an extension of time of thirty (30) days be granted to answer the complaint or otherwise plead to the allegations contained therein.

**I HEREBY CERTIFY:** I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Andrés Guillemard Noble, Esq.; Pedro J. Córdova, Esq.; Angel de Corral, Esq.; José Héctor Vivas, Esq.; Doris Quiñones Tridas, Esq.; Roberto Ruiz Comas, Esq.; Igor J. Domínguez, Esq.; José L. González Castañer, Esq., Marta Irene Feliciano Montilla, Esq.; Alexis D. Mattei Barrios, Esq.; Raphael Pena Ramón, Esq.; Ricardo L. Rodríguez Padilla, Esq.; Joan Schlump Peters, Esq.; José Enrique Otero, Esq. and Pedro Toledo González, Esq.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 28th day of October, 2004.

**S/Gilda del C. Cruz Martino**  
**GILDA DEL C. CRUZ MARTINO**

USDC NO. 206508

SIMED

COUNSEL FOR SIMED as insurance carrier of Drs. Alvaro A. Santaella Jiménez, Iván Terrón Méndez, Mildred D. Quiñónez Pardo, Amaury Vélez Torres, Alberto de la Vega and Adel Vargas Rodríguez

CENTRO EUROPA BUILDING  
PONCE DE LEON 1492, SUITE 401  
SAN JUAN, PR 00907-4117  
P.O. BOX 9023875  
SAN JUAN, PR 00902-3875  
TEL: (787) 641-1437 (787) 641-1434  
FAX: (787) 723-0014  
E-MAIL: cruzg@simedpr.com